

Index	Generator Status	Focus Area	Rule Cite	Potential for Harm	Extent of Deviation	Notes	Significantly Detrimental	Economic Benefit Calculation	Multiday or Counts Calculation	Regulation Description	Comments
1	VSQG/SQG/LQG/TRA/TSD	General	74-4-13(B) NMSA	Major	Major	Varies depending on facts of case			M	It is unlawful for any hazardous waste generator, transporter, or facility owner or operator to fail to comply with the provisions of this act or departmental orders	
2	VSQG/SQG/LQG/TRA/TSD	General	270.1(c) NMAC 20.4.1.900 and 901;	Major	Major	Varies depending on facts of case	X	X	M	It is unlawful for any hazardous waste generator, transporter, or facility owner or operator to operate without a valid permit	
3	VSQG/SQG/LQG/TRA/TSD	General	270.30(a) NMAC 20.4.1.900 and 901;	Major	Major	Varies depending on facts of case	X	X	M	It is unlawful for any hazardous waste generator, transporter, or facility owner or operator to fail to comply with a permit	
4	VSQG/SQG/LQG/TRA/TSD	General	74-4-13(B) NMSA	Major	Major	Varies depending on facts of case	X	X	M	It is unlawful for any hazardous waste generator, transporter, or facility owner or operator to cause, authorize, create, suffer, or allow an imminent hazard to occur or continue	
5	VSQG/SQG/LQG/TRA/TSD	General	74-4-4.3(A)(1)(a) NMSA	Minor	Major	Varies depending on facts of case				It is unlawful for any hazardous waste generator, transporter, or facility owner or operator to refuse lawful inspection / Failure to allow lawful inspection	
6	VSQG/SQG/LQG	Waste Management	262.11	PH Ranking System	Major=Percentage of the facility's hazardous waste streams with no WD exceeds 75% or NMED requested WD and facility failed to comply or Waste disposed as non-haz without WD Moderate= Percentage of the facility's hazardous waste streams with no WD is 25% to 75% or Facility has only one waste stream and no WD Minor= Percentage of facility's hazardous waste streams with no WD is less than 25%					Failure to perform an accurate waste determination	
7	VSQG	Waste Management	262.14(a)(5)	PH Ranking System	Major	Varies depending on facts of case		X		VSQG improper treatment or disposal of hazardous waste	
8	VSQG	Consolidation	262.14(a)(5)(viii)(A)	PH Ranking System	Major	Varies depending on facts of case		X		Failure to be under the control of the LQG	Used 262.14(a)(5) because involves disposal through an unauthorized entity
9	VSQG	Consolidation	262.14(a)(5)(viii)(B)(1)	PH Ranking System	Based on % of unlabeled containers Major=60-100% Moderate=11-59% Minor=0-10%	Enforcement discretion advised on small volumes				Failure for VSQG to label containers as hazardous waste	Used LQG/SQG labeling violation ([SQG] 262.16(b)(6)(i)(C) [LQG] 262.17(a)(5)(i)(C))
10	VSQG	Consolidation	262.14(a)(5)(viii)(B)(2)	PH Ranking System	Based on % of unlabeled containers Major=60-100% Moderate=11-59% Minor=0-10%	Enforcement discretion advised on small volumes				Failure of VSQG to include hazards of contents	Used LQG/SQG labeling violation ([SQG] 262.16(b)(6)(i)(C) [LQG] 262.17(a)(5)(i)(C))
11	VSQG/SQG/LQG	Waste Management	262.14(b)/262.35	PH Ranking System	Major			X		Disposal of free liquids in a landfill	Used improper disposal violation (262.14(a)(5))
12	SQG	Waste Management	262.16 (b)	PH Ranking System	Major			X	M	SQG storage of hazardous waste for greater than 180 days without applying for, and receiving, a RCRA permit.	
13	LQG	Waste Management	262.17(a)	PH Ranking System	Major			X	M	Generator storage of hazardous waste for greater than 90 days without applying for, and receiving, a RCRA permit	
14	SQG / LQG	SAA Container Management	262.15(a)(1)	PH Ranking System	Major	Multiday if well documented			M/C	Failure to transfer the contents of a container that is not in good condition or is leaking	
15	SQG / LQG	SAA Container Management	262.15(a)(2)	PH Ranking System	Major				M/C	Failure to use a container that is made of, or lined with, materials compatible with the waste to be stored	
16	SQG/LQG	SAA Container Management	262.15(a)(3)	PH Ranking System	Major					Storing incompatibles	
17	SQG / LQG	SAA Container Management	262.15(a)(4)(i)	PH Ranking System	Major					Failure to keep a container holding hazardous waste closed during storage, except when adding or removing waste	
18	SQG / LQG	SAA Container Management	262.15(a)(5)(i)	Minor	Minor				C	Waste accumulation containers must be clearly marked or labeled 'Hazardous Waste' and an indication of the hazards on the container.	
19	SQG / LQG	SAA Container Management	262.15(a)(6)	Minor	Minor					Waste satellite accumulation in excess of 55 gallons or 1 quart of acutely toxic waste must be dated	
20	SQG / LQG	Container Management	[SQG] 262.16(b)(2)(i) [LQG] 262.17(a)(1)(ii)	PH Ranking System	Major	Multiday if well documented			M/C	Failure to transfer the contents of a container that is not in good condition or is leaking	
21	SQG / LQG	Container Management	[SQG] 262.16(b)(2)(ii) [LQG] 262.17(a)(1)(iii)	PH Ranking System	Major				M/C	Failure to use a container that is made of, or lined with, materials compatible with the waste to be stored	Was a missing CAA violation, re-added and got correct citation
22	SQG / LQG	Container Management	[SQG] 262.16(b)(2)(iii)(A) [LQG] 262.17(a)(1)(iv)(A)	PH Ranking System	Major					Failure to keep a container holding hazardous waste closed during storage, except when adding or removing waste	
23	SQG / LQG	Container Management	[SQG] 262.16(b)(2)(iii)(B) [LQG] 262.17(a)(1)(iv)(B)	PH Ranking System	Major					Failure to open, handle, or store a container in a manner that will not cause the container to rupture or leak	
24	SQG / LQG	Container Management	[SQG] 262.16(b)(2)(iv) [LQG] 262.17(a)(1)(v)	Minor	Major					Generators shall conduct inspections	Note that what the penalty is talking about is NOT required by the regulatory language
25	SQG / LQG	Container Management	[SQG] 262.16(b)(2)(v)(A) [LQG] 262.17(a)(1)(vii)(A)	PH Ranking System	Major					Failure of a generator to ensure incompatible wastes are not placed in the same container	
26	SQG / LQG	Container Management	[SQG] 262.16(b)(2)(v)(B) [LQG] 262.17(a)(1)(vii)(B)	PH Ranking System	Major					Failure of a generator to ensure hazardous waste is not placed in a container that previously held incompatible waste	
27	SQG / LQG	Container Management	[SQG] 262.16(b)(2)(v)(C) [LQG] 262.17(a)(1)(vii)(C)	PH Ranking System	Major					Failure of a generator to ensure hazardous waste and incompatible wastes or other materials stored nearby are separated by means of a dike, berm, wall, or other device	
28	SQG / LQG	Container Management	[SQG] 262.16(b)(6)(i)(C) [LQG] 262.17(a)(5)(i)(C)	PH Ranking System	Major=no shipments offsite Minor= LQG shipment w/n last 90 days or SQG shipment w/n last 180 days			X	M	Waste storage containers must be clearly marked with the date upon which accumulation began and the date must be visible for inspection	

Index	Generator Status	Focus Area	Rule Cite	Potential for Harm	Extent of Deviation	Notes	Significantly Detrimental	Economic Benefit Calculation	Multiday or Counts Calculation	Regulation Description	Comments
29	SQG / LQG	Container Management	[SQG]262.16(b)(6)(i)(A-B) [LQG] 262.17(a)(5)(i)(A-B)	PH Ranking System	Based on % of unlabeled containers <u>Major</u> =60-100% <u>Moderate</u> =11-59% <u>Minor</u> =0-10%	Enforcement discretion advised on small volumes				Waste storage containers must be clearly marked or labeled 'Hazardous Waste', and the container's hazards.	
30	SQG / LQG	Container Management	[SQG]262.16(b)(8)(v) [LQG]262.255	PH Ranking System	<u>Moderate</u> =Most Drums 3 deep or more <u>Minor</u> =some drums 2 deep or more					Failure to maintain adequate aisle space to allow the unobstructed movement of personnel and equipment for the inspection of label and drum condition.	
31	LQG	Container Management	262.17(a)(1)(i)	PH Ranking System	Major					Failure of a generator to manage hazardous waste placed in containers in accordance with the requirements of subparts AA, BB, and CC	
32	LQG	Container Management	262.17(a)(1)(vi)(A)	PH Ranking System	<u>Major</u> = <15 ft <u>Moderate</u> = >15<40 ft <u>Minor</u> = >40<50 ft					Containers holding ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line.	
33	SQG/LQG	Container Management	262.31	PH Ranking System	Minor	Enforcement discretion advised for extent of deviation				Failure of a generator to label waste in accordance with DOT requirements prior to shipment, or offering waste for transport off-site	
34	SQG/LQG	Container Management	262.32(b)(1)	PH Ranking System	Minor					Failure of a generator to mark each container of 119 gallons or less with a HW Label (49 CFR 172.304) prior to shipment, or offering waste for transport off-site	
35	SQG/LQG	Container Management	262.33	PH Ranking System	<u>Moderate</u> =LQG <u>Minor</u> =SQG					Failure of a generator to placard a transport vehicle, or offer the transporter the appropriate placards, prior to shipping, or offering waste for shipment off-site.	
36	SQG	SQG Tanks	262.16(b)(3)(ii)	PH Ranking System	Major				M	Failure of a SQG to comply with general operating requirements for Tank Systems	
37	SQG	SQG Tanks	262.16(b)(3)(iii)	PH Ranking System	<u>Major</u> =no inspection <u>Minor</u> =Inspected but not documented				M	Failure of a SQG to inspect, where present, discharge control equipment, data from monitoring equipment and the level of waste in the tank at least once each operating day, and the tank construction materials and area surrounding confinement structures at least weekly	
38	SQG	SQG Tanks	262.16(b)(3)(vi)	PH Ranking System	Major			X	M	Failure of a SQG to remove all hazardous waste from tanks, discharge control equipment, and discharge confinement structures upon closure of the facility	
39	SQG	SQG Tanks	262.16(b)(3)(vii)	PH Ranking System	Major					Failure to comply with special conditions for accumulation of ignitable or reactive waste in a tank as an SQG	Noticed this one was not included with the SQG tanks from before, added and used the above violation, failure to handle a container properly, as a template. [SQG]262.16(b)(2)(iii)(B) [LQG]262.17(a)(1)(iv)(B)
40	SQG/LQG	Tanks	[SQG]262.16(b)(6)(ii)(A-B) [LQG] 262.17(a)(5)(ii)(A-B)	PH Ranking System	Based on % of unlabeled containers <u>Major</u> =60-100% <u>Moderate</u> =11-59% <u>Minor</u> =0-10%					Waste storage tanks must be clearly marked or labeled 'Hazardous Waste', and the container's hazards.	The citation is no separate for tanks and containers
41	SQG/LQG	Tanks	[SQG] 262.16(b)(6)(ii)(C-D) [LQG] 262.17(a)(5)(ii)(C-D)	PH Ranking System	<u>Major</u> =no shipments offsite <u>Minor</u> = LQG shipment w/n last 90 days or SQG shipment w/n last 180 days			X	M	Failure to maintain records showing that hazardous waste has not resided in a tank greater than 90/180 days	ASD violation also now separate
42	LQG	Tanks	265.192(a)	PH Ranking System	Major			X		Failure of a generator to obtain a written assessment reviewed and certified by a qualified Professional Engineer attesting the tank system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste	
43	LQG	Tanks	265.192(b)	PH Ranking System	Major			X		Failure of a generator to have an independent, qualified installation inspector or a qualified Professional Engineer, inspect the tank system or component prior to covering, enclosing, or placing a new tank system or component in use	
44	LQG	Tanks	265.193(a)	PH Ranking System	Major			X		Failure of a generator to provide secondary containment for hazardous waste tanks	
45	LQG	Tanks	265.193(b)(1)	PH Ranking System	Major			X		Failure of the secondary containment to be designed, installed, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, ground water, or surface water at any time during the use of the tank system	
46	LQG	Tanks	265.193(b)(2)	PH Ranking System	Major			X		Failure of a generator to provide secondary containment capable of detecting and collecting releases and accumulated liquids until the material is removed	
47	LQG	Tanks	265.193(c)	PH Ranking System	Major			X		Failure of a generator to provide secondary containment meeting the minimum requirements	
48	LQG	Tanks	265.193(d)	PH Ranking System	Major			X		Failure of a generator to provide secondary containment that includes either a liner (external to the tank), a vault, a double-walled tank, or an equivalent, approved, device	
49	LQG	Tanks	265.193(e)	PH Ranking System	Major			X		Failure of a secondary containment system to meet specific requirements	
50	LQG	Tanks	265.193(f)	PH Ranking System	Major			X		Failure of ancillary equipment to be provided with full secondary containment	
51	LQG	Tanks	265.194(a)	PH Ranking System	Major			X		Placement of hazardous waste or treatment reagents in a tank system that could cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail	
52	LQG	Tanks	265.194(a)	PH Ranking System	Major			X		Discharge of HW to septic tank by LQG	
53	LQG	Tanks	265.194(b)	PH Ranking System	Moderate					Failure of a generator to use appropriate controls and practices to prevent spills and overflows from the tank or secondary containment systems.	
54	LQG	Tanks	265.195 All Included	Major	Major		X	X	M	Failure of a generator to perform any tank inspections	
55	LQG	Tanks	265.195(a)	Minor	<u>Major</u> =no inspection <u>Minor</u> =Inspected but not documented					Failure of a generator to inspect, where present, at least once each operating day, data gathered from monitoring and leak detection equipment to ensure the tank system is being operated according to its design	
56	LQG	Tanks	265.195(b)	Minor	<u>Major</u> =no inspection <u>Minor</u> =Inspected but not documented			X		Failure of a generator to inspect at least once each operating day overflow/spill control equipment, the above ground portion of the tank system, if any, to detect corrosion or releases of waste, and the construction materials and the area immediately surrounding the tank system and secondary containment to detect erosion or signs of releases of hazardous waste	
57	LQG	Tanks	265.195(c)	Minor	<u>Major</u> =no inspection <u>Minor</u> =Inspected but not documented			X		Failure of a generator that uses leak detection equipment or established workplace practices to ensure leaks are promptly identified, to inspect, and document, at least weekly overflow/spill control equipment, the above ground portion of the tank system, if any, to detect corrosion or releases of waste, and the construction materials and the area immediately surrounding the tank system and secondary containment to detect erosion or signs of releases of hazardous waste	
58	LQG	Tanks	265.195(e)	Minor	<u>Major</u> =no inspection <u>Minor</u> =Inspected but not documented					Failure of a generator to inspect ancillary equipment not provided with secondary containment at least once each operating day	
59	LQG	Tanks	265.195(f)	Minor	<u>Major</u> =no inspection <u>Minor</u> =Inspected but not documented					Failure of a generator to inspect a cathodic protection system using the appropriate inspection schedule	
60	LQG	Tanks	265.196	Major	Major		X	X	M	Failure to immediately remove from use a tank system or secondary containment system from which there has been a leak or spill, which is unfit for use	
61	LQG	Tanks	265.196(a)	PH Ranking System	Major			X	M	Failure to immediately stop the flow of hazardous waste into a tank system or secondary containment system and inspect the system to determine the cause of the release	
62	LQG	Tanks	265.196(b)	PH Ranking System	Major			X	M	Failure to remove waste from the leaking tank system and/or secondary containment system within 24 hours, or in as timely a manner as is possible, to prevent harm to human health and the environment	
63	LQG	Tanks	265.196(c)	PH Ranking System	Major		X	X		Failure to prevent further migration of a leak or spill to soils or surface water or failure to remove and properly dispose of visible contamination of soils or surface water	
64	LQG	Tanks	265.196(d)	PH Ranking System	<u>Major</u> =No report <u>Minor</u> =Late					Failure to report a release within 24 hours of detection	
65	LQG	Tanks	265.196(f)	PH Ranking System	Major			X		Failure to certify a major repair of a tank system	
66	LQG	Tanks	265.197(a)	PH Ranking System	Major			X		Failure of a generator, at closure of a tank system, to remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste, to manage the waste as hazardous waste, unless 261.3(d) applies	
67	LQG	Drip Pads	262.17(a)(3)	PH Ranking System	Major			X		Failure of a generator using tanks, sumps, and other collection devices used in conjunction with drip pads regulated under Subpart W, to meet the requirements of 40 CFR Part 265 Subpart J	

Index	Generator Status	Focus Area	Rule Cite	Potential for Harm	Extent of Deviation	Notes	Significantly Detrimental	Economic Benefit Calculation	Multiday or Counts Calculation	Regulation Description	Comments
68	SQG/LQG	Manifest	262.20(a)(1)	PH Ranking System	Major=LQG w/ no docs Moderate=LQG w/shipping papers to TSD or SQG w/ no docs Minor= SQG w/ shipping papers to TSD	Record retention required for three years; give a break for SQG's getting their waste to the right place with shipping papers				Failure to prepare a hazardous waste manifest thus improper disposal (Rank it for Improper disposal)	
69	SQG/LQG	Manifest	262.20(a)(1)	Minor	Moderate = LQG w/ inadequate docs Minor= SQG w/ inadequate docs				C	Failure to prepare a manifest in accordance with the instructions. (Manifest errors only)	
70	SQG/LQG	Manifest	262.20(b)	Major	Major				C	Failure to designate a facility permitted to manage the waste described on the manifest	
71	SQG/LQG	Manifest	262.20(d)	Major	Major				M/C	Failure of a generator to designate an alternate facility or instruct the transporter to return the waste if it is not accepted by the designated facility(ies)	
72	SQG	Manifest	262.20(e)(2)	PH Ranking System	Moderate					Failure of a SQG to have or maintain a copy of a reclamation agreement if a manifest is not used to transport hazardous waste	
73	SQG/LQG	Manifest	262.23(a)	Minor	Minor				C	Failure of a generator to sign a manifest by hand; obtain the handwritten signature of the initial transporter and date of acceptance on the manifest; or retain one copy of the manifest	
74	SQG / LQG	Manifest	262.40(a)	Minor	Moderate				C	Generator must keep a copy of each manifest for 3 years from the date the waste was accepted by the transporter	
75	LQG	Manifest	262.42(a)(1)	PH Ranking System	Moderate				C	Failure of a Generator who does not receive a completed manifest within 35 days of the date it was accepted by the transporter to contact the transporter and TSD to determine the status of the waste	
76	LQG	Manifest	262.42(a)(2)	PH Ranking System	Moderate				C	Failure of a Generator who does not receive a completed manifest within 45 days of the date it was accepted by the transporter to file an exception report	
77	SQG	Manifest	262.42(b)	PH Ranking System	Minor				C	Failure of a SQG who does not receive a completed manifest within 60 days of the date it was accepted by the transporter to submit a legible copy of the manifest along with an indication that the completed manifest was not received	
78	SQG / LQG	LDR	268.7(a)	PH Ranking System	Major			X		Failure of generator to perform waste analyses prior to shipping of LDR waste to determine if the waste is restricted from land disposal	
79	TSD	LDR	268.50(b)	PH Ranking System	Major = > 2 years Moderate=< 2 years			X	M	Storage of wastes restricted from land disposal for more than one year without demonstrating such storage time is necessary	
80	SQG / LQG/TRA/TSD	LDR	268.3(a)	PH Ranking System	Major	count per dilution event		X	C	Dilution of a land disposal restricted waste or treatment residual as a substitute for adequate treatment.	
81	SQG/LQG	LDR	268.9(a)	PH Ranking System	Based on % of unlabeled containers; Major=60-100% Moderate=11-59% Minor= 0-10%					Failure of initial generator to identify all appropriate waste codes.	
82	SQG / LQG	Emergency Preparedness	[SQG] 262.16(b)(8)(i) [LQG] 262.251	PH Ranking System	Major = LQG Moderate= SQG					Failure of a generator to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment	
83	SQG / LQG	Emergency Preparedness	[SQG] 262.16(b)(8)(ii) [LQG] 262.252	PH Ranking System	Moderate= No equipment Minor= Some equipment			X		Failure of a Generator to maintain required equipment, if necessary, - internal communication or alarm system, telephone, or radio, fire extinguisher, and water of adequate volume and pressure	
84	SQG / LQG	Emergency Preparedness	[SQG] 262.16 (b)(8)(iii) [LQG] 262.253	Minor	Minor					Failure of a generator to test all facility communications and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment	
85	SQG / LQG	Emergency Preparedness	[SQG] 262.16(b)(8)(iv) [LQG] 262.254	Minor	Minor					Failure of a generator to provide immediate access to internal alarms or communications systems during waste handling operations	
86	SQG / LQG	Emergency Preparedness	[SQG] 262.16 (b)(8)(vi)(A) [LQG] 262.256(a)	Minor	Moderate = LQG Minor = SQG					Failure of a generator to make required arrangements with local authorities	
87	SQG	Emergency Preparedness	262.16(b)(9)(i)	Minor	Minor					Failure of SQG to have an Emergency Coordinator on the premises or on call (available to respond in short period of time)	
88	SQG	Emergency Preparedness	262.16(b)(9)(ii)	Minor	Minor					Failure of SQG to post emergency information next to telephone	
89	SQG	Emergency Preparedness	262.16(b)(9)(iv)	Moderate	Major= No response Moderate= Inadequate response					Failure of SQG emergency coordinator, or his designee, to respond appropriately to an emergency	
90	LQG	Emergency Preparedness	262.260(a)	Moderate	Major			X		Failure of a generator to have a contingency plan	
91	LQG	Emergency Preparedness	262.260(b)	PH Ranking System	Major= total failure Moderate= Partial Implementation					Failure of a generator to implement the contingency plan immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, to air, soil, or surface water	
92	LQG	Emergency Preparedness	262.261(a)	Minor	Moderate= Missing Plan Minor= Incomplete Plan					Failure of a contingency plan to describe actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosion, or release of hazardous waste or hazardous waste constituents, to air, soil, or surface water	
93	LQG	Emergency Preparedness	262.261(c)	Minor	Moderate= Missing Plan Minor= Incomplete Plan					Failure of a contingency plan to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency service	
94	LQG	Emergency Preparedness	262.261(d)	Minor	Moderate= Missing Plan Minor= Incomplete Plan					Failure of a contingency plan to list names, and emergency telephone numbers of all persons qualified to act as emergency coordinator. This may be a 24-hr emergency telephone line	
95	LQG	Emergency Preparedness	262.261(e)	Minor	Moderate= Missing Plan Minor= Incomplete Plan					Failure of a contingency plan to include a list of all emergency equipment at the facility	
96	LQG	Emergency Preparedness	262.261(f)	Minor	Moderate= Missing Plan Minor= Incomplete Plan					Failure of a contingency plan to include an evacuation plan for facility personnel, including signals for when to begin evacuation, evacuation routes, and alternate evacuation routes	
97	LQG	Emergency Preparedness	262.262	Moderate	Major					Failure of the generator to maintain a copy of the current contingency plan at the facility	
98	LQG	Emergency Preparedness	262.262(a-b)	Minor	Minor					Failure of a generator to submit copies of the current contingency plan, and quick reference guide, to local emergency responders	
99	LQG	Emergency Preparedness	262.263(a)	Minor	Minor					Failure of a generator to review and immediately amend a contingency plan when applicable regulations are revised	
100	LQG	Emergency Preparedness	262.263(b)	Minor	Moderate					Failure of a generator to review and immediately amend a contingency plan when the plan fails in an emergency	
101	LQG	Emergency Preparedness	262.263(c)	Minor	Moderate					Failure of a generator to review and immediately amend a contingency plan when the facility changes in design, construction, operation, maintenance, or other circumstances that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency	
102	LQG	Emergency Preparedness	262.263(d)	Minor	Moderate=> 6 mos overdue Minor=<6 mos overdue					Failure of a generator to review and immediately amend a contingency plan when the list of emergency coordinators changes	
103	LQG	Emergency Preparedness	262.263(e)	Minor	Minor					Failure of a generator to review and immediately amend a contingency plan when the list of emergency equipment changes	
104	LQG	Emergency Preparedness	262.264	Moderate	Major					Failure of a generator to appoint an emergency coordinator who is on premises or available to reach the facility in a short period of time at all times	
105	LQG	Emergency Preparedness	262.265	PH Ranking System	Major= total failure Moderate= Partial Implementation	Case by Case considerations			M	Failure of a generator to take appropriate action during an emergency	
106	LQG	Emergency Preparedness	262.265(a)	PH Ranking System	Minor	Case by Case considerations			M	Failure of a generator to activate facility alarm or communication systems and notify appropriate state and local authorities in response to an imminent or actual emergency	
107	LQG	Emergency Preparedness	262.265(b)	PH Ranking System	Minor	Case by Case considerations			M	Failure of a generator to identify the character, exact source, amount and areal extent of released materials in the event of a release, fire, or explosion	
108	LQG	Emergency Preparedness	262.265(c)	PH Ranking System	Minor	Case by Case considerations			M	Failure of a generator to assess possible hazards to human health or the environment as a result of a release, fire, or explosion	
109	LQG	Emergency Preparedness	262.265(d)	PH Ranking System	Minor	Case by Case considerations			M	Failure of a generator to report his findings in the event of a release, fire, or explosion	

Index	Generator Status	Focus Area	Rule Cite	Potential for Harm	Extent of Deviation	Notes	Significantly Detrimental	Economic Benefit Calculation	Multiday or Counts	Regulation Description	Comments
110	LQG	Emergency Preparedness	262.265(e)	PH Ranking System	Minor	Case by Case considerations				Failure of a generator to take all reasonable measures to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility during an emergency	
111	LQG	Emergency Preparedness	262.265(f)	PH Ranking System	Minor	Case by Case considerations				Failure of a generator to monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate, in the event of a shutdown during an emergency	
112	LQG	Emergency Preparedness	262.265(g)	PH Ranking System	Minor	Case by Case considerations			M	Failure of a generator to provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water or any other material that results from a release, fire, or explosion at the facility. These materials must be managed as hazardous waste unless the generator can demonstrate that it is not	
113	LQG	Emergency Preparedness	262.265(h)	PH Ranking System	Minor	Case by Case considerations			M	Failure of a generator to ensure that incompatible wastes are kept from released material and that emergency equipment listed in the contingency plan is cleaned and fit for use before operations are resumed	
114	LQG	Emergency Preparedness	262.265(i)	Minor	Minor	Case by Case considerations			M	Failure of the generator to note in the operating record the date and time of any incident that requires implementing the contingency plan and failure to submit a report within 15 days of the incident	
115	SQG	Training	262.16(b)(9)(iii)	Minor	Major			X	C	Failure of SQG to ensure employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to the responsibilities	
116	LQG	Training	262.17(a)(7)(i)(A)	Moderate	Major= None Moderate= Inadequate			X	C	Facility personnel must successfully complete a program of classroom instruction, online training (e.g., computer-based or electronic), or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part	
117	LQG	Training	262.17(a)(7)(i)(B)	Minor	Major			X	C	Failure of a Generator to have a training program directed by a person trained in hazardous waste management procedures and that teaches personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed	
118	LQG	Training	262.17(a)(7)(i)(C)	Moderate	Moderate			X	C	Failure of a Generator to have a training program designed to ensure facility personnel are able to respond effectively to	
119	LQG	Training	262.17(a)(7)(ii)	Moderate	Minor			X	C	Failure of a Generator to provide training to personnel within 6 months after the date of their employment or assignment to a new position at the facility	
120	LQG	Training	262.17(a)(7)(iii)	Moderate	Moderate=> 1 yr overdue Minor=<1 yr overdue			X	C	Facility personnel must take part in an annual review of the initial training required in 262.17(a)(7)(i).	
121	LQG	Training	262.17(a)(7)(iv)	Minor	Moderate				C	Failure of a Generator to document job titles, written job descriptions, a description of the type and amount of training, and records that document training has been given and completed	
122	LQG	Training	262.17(a)(7)(v)	Minor	Minor				C	Failure of a Generator to maintain training records for current personnel until closure of facility and records for former employees for 3 years from the date the employee last worked at the facility	
123	SQG/LQG	Record Keeping	262.11(f)	PH Ranking System	Major=Percentage of the facility's hazardous waste streams with no WD exceeds 75% or NMED requested WD and facility failed to comply or Waste disposed as non-haz without WD Moderate= Percentage of the facility's hazardous waste streams with no WD is 25% to 75% or Facility has only one waste stream and no WD Minor= Percentage of facility's hazardous waste streams with no WD is less than 25%					Failure of a facility to maintain records of hazardous waste determinations	
124	LQG	Record Keeping	262.40(b)	Minor	Minor					Generator must keep a copy of each Biennial Report or Exception Report for a period of 3 years from the due date of the report	
125	LQG	Record Keeping	262.41(a)	Minor	Major= no report Moderate= incomplete report			X	M	Generator who ships hazardous waste off-site must submit a Biennial Report by March 1 of each even numbered year documenting activities during the previous year	
126	LQG	Record Keeping	262.41(b)	Minor	Major= no report Moderate= incomplete report			X	M	Generator who treats, stores, or disposes of hazardous waste on-site must submit a biennial report in accordance with the provisions of 40 CFR 270, 264, 265, and 266.	
127	SQG / LQG/TRA/TSD	LDR	268.3(a)	PH Ranking System	Major	count per dilution event		X	C	Dilution of a land disposal restricted waste or treatment residual as a substitute for adequate treatment.	
128	SQG / LQG	LDR	268.7	Minor	Minor					Missing or incorrect information on land ban forms	
129	SQG / LQG	LDR	268.7(a)	PH Ranking System	Major			X		Failure of generator to perform waste analyses prior to shipping of LDR waste to determine if the waste is restricted from land disposal	
130	SQG / LQG	LDR	268.7(a)(5)	PH Ranking System	Major= no plan Moderate= incomplete plan or not following plan			X		Failure of a generator to develop and follow a written waste analysis plan for on-site treatment of restricted wastes in tanks or containers	
131	SQG / LQG	LDR	268.7(a)(8)	Minor	Moderate=LQG Minor=SQG					Failure to retain LDR notices, certifications, demonstrations, waste analysis data, for three years from the date the waste is subject to documentation	
132	SQG	LDR	268.7(a)(10)	Minor	Minor					Failure of SQG to provide one time LDR notice with tolling agreement	
133	SQG/LQG	LDR	268.9(a)	PH Ranking System	Based on % of unlabeled containers; Major=60-100% Moderate=11-59% Minor= 0-10%					Failure of initial generator to identify all appropriate waste codes.	
134	SQG / LQG	LDR	268.9(d)	Minor	Moderate					Failure to submit certification that a treated characteristic waste is being sent to a Subtitle D landfill.	
135	TSD	LDR	268.50(b)	PH Ranking System	Major = > 2 years Moderate=< 2 years			X	M	Storage of wastes restricted from land disposal for more than one year without demonstrating such storage time is necessary	
136	VSQG/SQG	Episodic Generator	[VSQG]262.232(a)(2) [SQG]262.232(b)(2)	PH Ranking System	Major= No notification	Enforcement discretion for other timframes				Failure to notify 30 prior to initiating a planned event or 72 hours for unplanned event	PH Ranking used because violation involves a quantity of waste generated; Major extent of deviation if no notification because it significantly impacts the program.
137	VSQG/SQG	Episodic Generator	[VSQG]262.232(a)(4)(i)(A) [SQG]262.232(b)(4)(i)(A)	PH Ranking System	Based on % of unlabeled containers Major=60-100% Moderate=11-59% Minor=0-10%	Enforcement discretion advised on small volumes				Failure to label containers as "episodic hazardous waste"	Same as labeling violation: [SQG] 262.16(b)(6)(i)(A-B) [LQG] 262.17(a)(5)(i)(A-B)
138	VSQG/SQG	Episodic Generator	[VSQG]262.232(a)(4)(i)(B) [SQG]262.232(b)(4)(i)(B)	PH Ranking System	Based on % of unlabeled containers Major=60-100% Moderate=11-59% Minor=0-10%	Enforcement discretion advised on small volumes				Failure to indicate the hazards of the contents	Same as labeling violation: [SQG] 262.16(b)(6)(i)(A-B) [LQG] 262.17(a)(5)(i)(A-B)
139	VSQG/SQG	Episodic Generator	[VSQG]262.232(a)(4)(i)(C) [SQG]262.232(b)(4)(i)(C)	PH Ranking System	Major=no shipments offsite Minor= LQG shipment w/n last 90 days or SQG shipment w/n last 180 days			X	M	Failure to date containers when event started	Same as ASD violation: [SQG] 262.16(b)(6)(i)(C) [LQG] 262.17(a)(5)(i)(C)
140	VSQG	Episodic Generator	262.232(a)(4)(iii)	PH Ranking System	Major = LQG amounts Moderate= SQG amounts					Failure to manage waste in a manner that minimizes releases	Same as failure to maintain facility violation 262.16(b)(8) and 262.251
141	VSQG	Episodic Generator	262.232(a)(4)(iii)(A)	PH Ranking System	Major	Multiday if well documented			M/C	Failure to keep containers in good condition, compatible with waste and closed	Used SQG/LQG container condition violation [SQG] 262.16(b)(2)(i) [LQG] 262.17(a)(1)(ii)
142	VSQG/SQG	Episodic Generator	[VSQG]262.232(a)(6) [SQG]262.232(b)(5)	PH Ranking System	Major			X	M	Failure to send the waste off site within 60 days of the event	Used >90 day storage for LQG 262.17(a)
143	VSQG/SQG	Episodic Generator	[VSQG]262.232(a)(7) [SQG]262.232(b)(7)	Minor	Moderate				C	Failure to maintain records of the event for 3 years	Used manifest retention violation 262.40(a)
144	TRA	Notification	263.11	Major	Major					Failure of a Transporter to obtain an EPA identification number prior to transporting hazardous waste	

Index	Generator Status	Focus Area	Rule Cite	Potential for Harm	Extent of Deviation	Notes	Significantly Detrimental	Economic Benefit Calculation	Multiday or Counts Calculation	Regulation Description	Comments
145	TRA	NM Notification	20.4.1.401 NMAC	Moderate	Major					Failure of a 10-day transfer facility operating in the state of New Mexico to notify and obtain a site-specific EPA Identification Number	Used generator failure to notify 262.18(a)
146	TRA	Manifest	263.20	PH Ranking System	Major= no docs Moderate= w/shipping papers or bill of lading on file					Failure of a Transporter to use a hazardous waste manifest	
147	TRA	Record Keeping	263.20(h)(4)	Minor	Minor					Failure of a Transporter to maintain copies of SQG Shipping papers for 3 years	
148	TRA	Releases	263.30(a)	PH Ranking System	Major		X			Failure of a Transporter to take appropriate action in the event of a discharge of hazardous waste during transportation	
149	TRA	Releases	263.30(c)	PH Ranking System	Major					Failure of a Transporter who has discharged hazardous waste to provide required notices or reports	
150	TSD	Record Keeping	264.73(g)	Major	Major = None Moderate = Inadequate			X		Failure to keep a written operating record	
151	TSD	General	264.11	Major	Major					Failure of a TSD to apply for an EPA identification number	
152	TSD	General	264.1(b)	Major	Major					Failure of a facility that treats, stores, or disposes of hazardous waste to meet the requirements of Part 264	
153	TSD	General	Permit Condition	Minor	Major					Failure of a TSD to report non-compliance with a permit	
154	TSD	Container Management	264.35	PH Ranking System	Major					Failure of a TSD to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment	
155	TSD	Container Management	268.50(a)(2)(i)	PH Ranking System	Minor = 0-10%; Moderate = 11-59%; Major = 60-100% of containers missing codes/dates.					Failure of TSD to maintain waste codes/dates on labels	
156	TSD	Inspection	264.15(a)	Minor	Minor					Failure of a TSD to inspect the facility for malfunctions and deteriorations, operator errors, and discharges of hazardous waste or hazardous waste constituents	
157	TSD	Inspection	264.15(b)	Minor	Minor					Failure of a TSD to follow a written inspection schedule for inspecting monitoring equipment, security devices, and operating and structural equipment	
158	TSD	Record Keeping	264.13(a)	PH Ranking System	Major					Failure of a TSD to obtain a detailed chemical and physical analysis of a waste prior to treatment, storage, or disposal	
159	TSD	Record Keeping	264.13(b)	Major	Major		X			Failure of a TSD to develop and follow a written waste analysis plan	
160	TSD	Record Keeping	264.73	Moderate	Major=no record Moderate=incomplete					Failure to maintain a written operating record	
161	TSD	Record Keeping	268.7(b)	Major	Major					Failure of treatment facilities to test their waste in accordance with their waste analysis plan.	
162	TSD	Manifest	264.71	PH Ranking System	Major=no docs Moderate=w/ shipping papers or bill of lading				C	Failure of a TSD to comply with manifest system requirements	
163	TSD	Security	264.14(a)	PH Ranking System	Major= no security Moderate= inadequate security		X			Failure of a TSD to prevent the unknowing entry, and minimize the possibility of unauthorized entry, of persons or livestock onto the active portion of his facility	
164	TSD	Security	264.14(b)	PH Ranking System	Major					Failure of a TSD that has not made a successful demonstration under 264.14(a)(1) and (a)(2) to provide a 24-hour surveillance system or an artificial barrier (fence) and a means to control entry at all time	
165	TSD	Security	264.14(c)	PH Ranking System	Major= None Moderate= Inadequate					Failure of a TSD that has not made a successful demonstration under 264.14(a)(1) and (a)(2) to post a sign with the legend "Danger Unauthorized Personnel Keep Out" at each entrance to the active portion of a facility and at other locations, in sufficient numbers to be seen from any approach to this active portion, and the sign must be legible from a distance of at least 25 feet	
166	TSD	Training	264.16(a)	Moderate	Major= None Moderate= Inadequate		X		C	Failure of a TSD to train personnel	
167	TSD	Training	264.16(b)	Moderate	Minor		X		M	Failure of a TSD to provide training to personnel within 6 months after the date of their employment or assignment to a new position at the facility	
168	TSD	Training	264.16(c)	Moderate	Moderate=>1 yr overdue Minor=<1 yr overdue		X		C	Failure of a TSD to provide an annual review of training required in 40 CFR 264.16(a)	
169	TSD	Training	264.16(d)	Minor	Moderate				C	Failure of a TSD to document job titles, written job descriptions, a description of the type and amount of training, and records that document training has been given and completed	
170	TSD	Training	264.16(e)	Minor	Minor				C	Failure of a TSD to maintain training records for current personnel until closure of facility and records for former employees for 3 years from the date the employee last worked at the facility	
171	TSD	Emergency Preparedness	264.51(a)	Moderate	Major		X			Failure of a TSD to have a contingency plan	
172	TSD	Emergency Preparedness	264.51(b)	PH Ranking System	Major					Failure of a TSD to implement the contingency plan immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, to air, soil, or surface water	
173	TSD	Emergency Preparedness	264.52(a)	Minor	Moderate= Missing Minor= Incomplete					Failure of a contingency plan to describe actions facility personnel must take to comply with 264.51 and 264.56 in response to fires, explosion, or release of hazardous waste or hazardous waste constituents, to air, soil, or surface water	
174	TSD	Emergency Preparedness	264.52(c)	Minor	Moderate= Missing Minor= Incomplete					Failure of a contingency plan to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency service	
175	TSD	Emergency Preparedness	264.52(d)	Minor	Moderate= Missing Minor= Incomplete					Failure of a contingency plan to list names, addresses, and telephone numbers (office and home) of all persons qualified to act as emergency coordinator	
176	TSD	Emergency Preparedness	264.52(e)	Minor	Moderate= Missing Minor= Incomplete					Failure of a contingency plan to include a list of all emergency equipment at the facility	
177	TSD	Emergency Preparedness	264.52(f)	Minor	Moderate= Missing Minor= Incomplete					Failure of a contingency plan to include an evacuation plan for facility personnel	
178	TSD	Emergency Preparedness	264.53(a)	Moderate	Major					Failure of the TSD to maintain a copy of the contingency plan at the facility	
179	TSD	Emergency Preparedness	264.53(b)	Minor	Minor					Failure of a TSD to submit copies of the contingency plan to local authorities	
180	TSD	Emergency Preparedness	264.54(a)	Minor	Moderate					Failure of a TSD to review and immediately amend a contingency plan if necessary when the permit is revised	
181	TSD	Emergency Preparedness	264.54(b)	Minor	Moderate					Failure of a TSD to review and immediately amend a contingency plan when the plan fails in an emergency	
182	TSD	Emergency Preparedness	264.54(c)	Minor	Moderate					Failure of a TSD to review and immediately amend a contingency plan when the facility changes in design, construction, operation, maintenance, or other circumstances that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency	
183	TSD	Emergency Preparedness	264.54(d)	Minor	Moderate					Failure of a TSD to review and immediately amend a contingency plan when the list of emergency coordinators changes	
184	TSD	Emergency Preparedness	264.54(e)	Minor	Moderate					Failure of a TSD to review and immediately amend a contingency plan when the list of emergency equipment changes	
185	TSD	Emergency Preparedness	264.56	PH Ranking System	Major=complete failure Moderate= partial implementation					Failure of a TSD to take appropriate action during an emergency	
186	TSD	Emergency Preparedness	264.56(a)	PH Ranking System	Moderate	Case by Case considerations			M	Failure of a TSD to activate facility alarm or communication systems and notify appropriate state and local authorities in response to an imminent or actual emergency	
187	TSD	Emergency Preparedness	264.56(b)	PH Ranking System	Moderate	Case by Case considerations			M	Failure of a TSD to identify the character, exact source, amount and areal extent of released materials in the event of a release, fire, or explosion	
188	TSD	Emergency Preparedness	264.56(c)	PH Ranking System	Moderate	Case by Case considerations			M	Failure of a TSD to assess possible hazards to human health or the environment as a result of a release, fire, or explosion	
189	TSD	Emergency Preparedness	264.56(d)	PH Ranking System	Moderate	Case by Case considerations			M	Failure of a TSD to report his findings in the event of a release, fire, or explosion	
190	TSD	Emergency Preparedness	264.56(e)	PH Ranking System	Moderate	Case by Case considerations				Failure of a TSD to take all reasonable measures to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility during an emergency	
191	TSD	Emergency Preparedness	264.56(f)	PH Ranking System	Moderate	Case by Case considerations				Failure of a TSD to monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate, in the event of a shutdown during an emergency	
192	TSD	Emergency Preparedness	264.56(g)	PH Ranking System	Moderate	Case by Case considerations			M	Failure of a TSD to provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water or any other material that results from a release, fire, or explosion at the facility	

Index	Generator Status	Focus Area	Rule Cite	Potential for Harm	Extent of Deviation	Notes	Significantly Detrimental	Economic Benefit Calculation	Multiday or Counts Calculation	Regulation Description	Comments
193	TSD	Emergency Preparedness	264.56(h)	PH Ranking System	Moderate	Case by Case considerations			M	Failure of a TSD to ensure that incompatible wastes are kept from released material and that emergency equipment listed in the contingency plan is cleaned and fit for use before operations are resumed	
194	TSD	Emergency Preparedness	264.56(i)	Minor	Moderate	Case by Case considerations			M	Failure of the TSD to note in the operating record the date and time of any incident that requires implementing the contingency plan and failure to submit a report within 15 days of the incident	
195	TSD	Emergency Preparedness	264.31	PH Ranking System	Major					Failure of a TSD to design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment	
196	TSD	Emergency Preparedness	264.32	PH Ranking System	Moderate			X		Failure of a TSD to maintain required equipment, if necessary, - internal communication or alarm system, telephone, or radio, fire extinguisher, and water of adequate volume and pressure	
197	TSD	Emergency Preparedness	264.33	PH Ranking System	Moderate			X		Failure of a TSD to test all facility communications and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment	
198	TSD	Emergency Preparedness	264.34	Moderate	Major					Failure of a TSD to provide immediate access to internal alarms or communications systems during waste handling operations	
199	TSD	Emergency Preparedness	264.37	Minor	Major					Failure of a TSD to make required arrangements with local authorities	
200	TSD	SWMU	264.91(a)	Major	Major					Failure of a TSD to conduct a monitoring and response program as required	
201	TSD	SWMU	264.92	Minor	Moderate					Exceedence by a TSD of maximum contaminant levels specified in the permit	
202	TSD	SWMU	264.93	Minor	Moderate					Failure of a TSD to monitor for hazardous constituents identified in the permit	
203	TSD	SWMU	264.95	Minor	Moderate				X	Failure of a TSD to monitor at the point of compliance specified in the permit	
204	TSD	SWMU	264.97	Major	Major			X		Failure of a TSD to implement a ground water monitoring program	
205	TSD	SWMU	264.99(a)	Minor	Major			X		Failure of a TSD to sample ground water for the list of constituents identified, meeting the concentration limits set, and during the compliance period specified	
206	TSD	SWMU	264.99(b)	Minor	Major			X		Failure of a TSD to install a ground water monitoring system at the compliance point specified	
207	TSD	SWMU	264.99(d)	Minor	Major					Failure of a TSD to determine if there is statistically significant evidence of increased contamination for any chemical parameter or hazardous constituent specified in the permit	
208	TSD	SWMU	264.100	Major	Major			X		Failure of a TSD to establish a corrective action program as required	
209	TSD	SWMU	264.101	Major	Major			X		Failure of a TSD to institute corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit at facility	
210	Solvent-Contaminated Wipes	Container Management	<u>Laundering:</u> 261.4(a)(26)(i) <u>Disposal:</u> 261.4(b)(18)(i)	PH Ranking System	Major					Failure to store exempt solvent-contaminated wipes in non-leaking, closed containers ; Container must also be sealed when full, upon storage, or during transport	Used closed container as template; [SQG] 262.16(b)(2)(iii) [LQG] 262.17(a)(1)(iv)(A)
211	Solvent-Contaminated Wipes	Container Management	<u>Laundering:</u> 261.4(a)(26)(i) <u>Disposal:</u> 261.4(b)(18)(i)	PH Ranking System	Moderate					Failure to label containers of Exempt Wipes as "Excluded Solvent-Contaminated Wipes"	Used container labeling [SQG] 262.16(b)(6)(i)(A-B) [LQG] 262.17(a)(5)(i)(A-B)
212	Solvent-Contaminated Wipes	Container Management	<u>Laundering:</u> 261.4(a)(26)(ii) <u>Disposal:</u> 261.4(b)(18)(ii)	PH Ranking System	Major			X	M	Storage of Exempt Solvent-Contaminated Wipes for >180 days	Used SQG exceedance 262.16 (b)
213	Solvent-Contaminated Wipes	Record Keeping	<u>Laundering:</u> 261.4(a)(26)(v)(A) <u>Disposal:</u> 261.4(b)(18)(v)(A)	Minor	Moderate				C	Failure to retain records of destination facilities currently receiving exempt solvent contaminated wipes	Same as HW manifest retention 262.40(a)
214	Solvent-Contaminated Wipes	Record Keeping	<u>Laundering:</u> 261.4(a)(26)(v)(B), <u>Disposal:</u> 261.4(b)(18)(v)(B)	Minor	Moderate					Failure to retain documents showing that the 180-day requirement is being met	Used HW manifest retention 262.40(a), determined counts not appropriate for this violation
215	Academic Lab Rule	Waste Management	262.206(a)(1), 262.210(b)(1), 262.211(e)(1)	PH Ranking System	Based on % of unlabeled containers <u>Major</u> =60-100% <u>Moderate</u> =11-59% <u>Minor</u> =0-10%					Failure to label containers	
216	Academic Lab Rule	Waste Management	262.206(a)(2)(i)	PH Ranking System	<u>Major</u> =no shipments offsite <u>Minor</u> = shipment off site in >1 year					Failure to date when accumulation started	
217	Academic Lab Rule	Waste Management	262.206(a)(2)(i), 262.210(b)(2), 262.211(e)(2)	PH Ranking System	Based on % of containers <u>Major</u> =60-100% <u>Moderate</u> =11-59% <u>Minor</u> =0-10%					Failure to provide sufficient information to ensure proper waste codes	
218	Academic Lab Rule	Waste Management	262.206(b)(1)	PH Ranking System	Based on % of containers <u>Major</u> =60-100% <u>Moderate</u> =11-59% <u>Minor</u> =0-10%					Failure to maintain containers in good condition	
219	Academic Lab Rule	Waste Management	262.206(b)(2)	PH Ranking System	Based on % of containers <u>Major</u> =60-100% <u>Moderate</u> =11-59% <u>Minor</u> =0-10%					Failure to ensure containers are compatible with contents	
220	Academic Lab Rule	Waste Management	262.206(b)(3)	PH Ranking System	Major					Failure to maintain containers closed	
221	Academic Lab Rule	Training	262.207(a)	Minor	Major					Failure to conduct training	262.16(b)(9)(iii)
222	Academic Lab Rule	Training	262.207(c)	Moderate	<u>Major</u> = None <u>Moderate</u> = Inadequate					Failure for a LQG to document training	262.16